

1 PHILLIP A. TALBERT
United States Attorney
2 MATHEW W. PILE, WSBA No. 32245.
Associate General Counsel
3 Office of Program Litigation, Office 7
4 Social Security Administration
MARCELO ILLARMO (MABN 670079)
5 Special Assistant United States Attorney
Office of the General Counsel
6 Social Security Administration
6401 Security Boulevard
7 Baltimore, Maryland 21235
8 Telephone: (510) 970-4822
E-Mail: Marcelo.Illarmo@ssa.gov
9 Attorneys for Defendant

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 No. 2:24-cv-02583-JDP

14 JACKLIN DANIEL,

15 Plaintiff,

16 v.

17 COMMISSIONER OF SOCIAL
18 SECURITY,

19 Defendant.

STIPULATION FOR EXTENSION TO FILE
OPPOSITION TO PLAINTIFF'S OPENING
BRIEF

20 IT IS HEREBY STIPULATED, by and between the parties, through their respective
21 counsel of record, that the time for responding to Plaintiff's motion for summary judgment be
22 extended from January 23, 2025 to February 24, 2025. This is Defendant's first request for an
23 extension of time to respond to Plaintiff's brief. Defendant respectfully requests this additional
24 time because counsel has experienced a death in the family and will be travelling home to Guam
25 for an as of yet unspecified amount of time.

26 The parties further stipulate that the Court's Scheduling Order shall be modified
27 accordingly.

- 28
- Defendant shall respond to Plaintiff's opening brief on or before February 24, 2025;

- Plaintiff's optional reply will be due within 14 days of the filing of Defendant's brief (on or before March 10, 2025).

Respectfully submitted,

DATE: January 7, 2025

/s/ Francesco Paulo Benavides *
FRANCESCO PAULO BENAVIDES
Attorney for Plaintiff
(* approved via email on 1/7/25)

PHILLIP A. TALBERT
United States Attorney

DATE: January 7, 2025

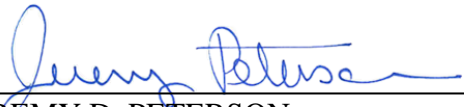
By s/ Marcelo Illarmo
MARCELO ILLARMO
Special Assistant United States Attorney

Attorneys for Defendant

ORDER

IT IS SO ORDERED.

Dated: January 8, 2025


JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE